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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re NARCO FREEDOM, INC., Debtor.	Chapter 7 Case No. 16-10123-smb
ALAN NISSELSON, as Chapter 7 Trustee of NARCO FREEDOM, INC., Plaintiff, -against – MATRIX TRUST COMPANY, PENSERV PLAN SERVICES, INC., JASON BRAND, JOHN CORNACHIO, RICHARD GROSS, ANDREA CORNACHIO, ALAN BRAND, and JONATHAN BRAND, Defendants.	Adv. Proc. No. 16-01088-smb

THIRTEENTH STIPULATION AND ORDER EXTENDING TIME

IT IS HEREBY STIPULATED AND AGREED, by and between Alan Nisselson ("**Trustee**" or "**Plaintiff**"), as trustee for the Chapter 7 estate (the "**Estate**") of Narco Freedom, Inc. ("**Debtor**") by his undersigned counsel, Windels Marx Lane & Mittendorf, LLP, on the one hand, and Matrix Trust Company ("**Defendant**"), by its undersigned counsel, Lowenstein Sandler LLP, on the other hand, that the time by which Defendant must answer, move, or otherwise respond to the Plaintiff's complaint in the above referenced adversary proceeding (the "**Complaint**") is further extended to, through and including December 29, 2017.

Nothing in this Stipulation is a waiver of the parties' right to agree to further extend Defendant's time to answer, move or otherwise respond to the Complaint.

Except as expressly set forth herein, the parties to this Stipulation reserve all rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile or electronic copy of this Stipulation may be deemed an original.

Dated: New York, New York
October 16, 2017

WINDELS MARX LANE & MITTENDORF, LLP
Attorneys for Alan Nisselson, Trustee, Plaintiff

By: /s/ *Howard L. Simon*
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Dated: New York, New York
October 16, 2017

LOWENSTEIN SANDLER LLP
Attorneys for Matrix Trust Company, Defendant

By: /s/ *Wojciech F. Jung*
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SO ORDERED:
New York, New York
October 16, 2017

/s/ STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE